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19 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
20 REED, and COASTAL PROTECTION
RANGERS, INC.
21

22 **UNITED STATES DISTRICT COURT**
23 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
24

25 CORY SPENCER, an individual;
26 DIANA MILENA REED, an
individual; and COASTAL
27 PROTECTION RANGERS, INC., a
28 California non-profit public benefit

CASE NO. 2:16-cv-02129-SJO (RAOx)

**JOINT STIPULATION AND
REQUEST TO CONTINUE
ALTERNATIVE DISPUTE
RESOLUTION DEADLINE**

1 corporation,

2 Plaintiffs,

3 v.

4 LUNADA BAY BOYS; THE
5 INDIVIDUAL MEMBERS OF THE
6 LUNADA BAY BOYS, including but
7 not limited to SANG LEE, BRANT
8 BLAKEMAN, ALAN JOHNSTON
9 AKA JALIAN JOHNSTON,
10 MICHAEL RAE PAPAYANS,
11 ANGELO FERRARA, FRANK
12 FERRARA, CHARLIE FERRARA,
13 and N. F.; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative
capacity; and DOES 1-10,

14 Defendants.

*Filed concurrently with Declaration of
Kurt Franklin; [Proposed] Order*

Complaint Filed: March 29, 2016
Trial Date: December 12, 2017

1 IT IS HEREBY STIPULATED by and between Plaintiffs Cory Spencer,
2 Diana Milena Reed, and the Coastal Protection Rangers (Plaintiffs) and Defendants
3 Michael R. Papayans, Alan Johnston, Angelo Ferrara, Brant Blakeman, Charlie
4 Ferrara, Frank Ferrara, Sang Lee, the City of Palos Verdes Estates, Chief of Police
5 Kepley, and Sang Lee (Defendants) (collectively, the Parties), by and through their
6 respective counsel, as follows:

7 WHEREAS, the current deadline for the Parties to complete the Alternative
8 Dispute Resolution (ADR) process is October 13, 2017;

9 WHEREAS, the Parties have agreed to mediation of this matter with one of
10 the following four mediators: Hon. Richard Kramer (Ret.), Hon. Carlos Moreno
11 (Ret.), Hon. John True (Ret.), and Hon. James Warren (Ret.);

12 WHEREAS, none of the above mediators have availability prior to the current
13 deadline for completion of ADR;

14 WHEREAS, the Parties believe that a continuance will not inconvenience or
15 prejudice the Court, as the pretrial conference is set for November 27, 2017, and
16 trial is set to commence December 12, 2017;

17 WHEREAS, the Parties mutually agree that a continuance of the
18 aforementioned deadline to complete the ADR process will not prejudice any Parties
19 to this case;

20 WHEREAS, the Parties believe that good cause exists for this request based
21 upon the stipulations set forth above;

22 THEREFORE, subject to the Court entering the proposed order, the Parties
23 stipulate and agree that the deadline to complete the ADR process shall be continued
24 to November 10, 2017;

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26 ///

27 ///

28 ///

1 NOW, THEREFORE, the Parties request that the Court enter an Order
2 consistent with this Stipulation.

3
4 DATED: October 6, 2017

HANSON BRIDGETT LLP

5
6 Bv: /s/ Kurt Franklin
7 KURT A. FRANKLIN
8 SAMANTHA D. WOLFF
9 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
REED, and COASTAL PROTECTION
RANGERS, INC.

10 DATED: October 6, 2017

LAW OFFICES OF MARK C. FIELDS,
APC

11
12
13 By: /s/ Mark C. Fields*
14 MARK C. FIELDS
15 Attorney for Defendant
16 ANGELO FERRARA

17 DATED: October 6, 2017

LAW OFFICES OF J. PATRICK CAREY

18
19 Bv: /s/ J. Patrick Carey*
20 J. PATRICK CAREY
21 Attorney for Defendant
ALAN JOHNSTON

22 DATED: October 6, 2017

HAVEN LAW

23
24 Bv:
25 PETER T. HAVEN
26 Attorney for Defendant
MICHAEL R. PAPAYANS

1 DATED: October 6, 2017

VEATCH CARLSON. LLP

2
3 Bv: _____
4 RICHARD P. DIEFFENBACH
5 Attorney for Defendant
BRANT BLAKEMAN

6 DATED: October 6, 2017

BREMER WHYTE BROWN &
O'MEARA, LLP

7
8 Bv: /s/ Alison Hurley*
9 ALISON K. HURLEY
10 Attorney for Defendants
11 CHARLIE FERRARA and
FRANK FERRARA

12 DATED: October 6, 2017

LEWIS BRISBOIS BISGAARD &
SMITH LLP

13
14 Bv: /s/ Tera Lutz*
15 TERA A. LUTZ
16 Attorney for Defendant
17 SANG LEE

18 DATED: October 6, 2017

KUTAK ROCK LLP

19
20 Bv: /s/ Edwin Richards*
21 EDWIN J. RICHARDS
22 Attorney for Defendants
23 CITY OF PALOS VERDES ESTATES
and CHIEF OF POLICE JEFF KEPLEY

24 *Pursuant to Local Rule 5-4.3.4, the signatories listed below, and on whose behalf
25 the filing is submitted, concur in the filing's content and have authorized the filing of
26 this Stipulation.
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